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December 26, 2024

Via ECF

The Honorable Peggy Kuo, U.S.M.J
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Fakhurtdinov v. ITG Communications, LLC, et al.* Case No.: 24-cv-01696(DG)(SJB);**Request for Extension of Time to Respond to Plaintiff's Motion, Currently Returnable on December 30, 2024**

Dear Honorable Magistrate Judge Kuo,

This firm was recently retained to represent the corporate defendant Domestic Supply, Inc. and the individual defendant Danila Barannikov ("Defendants Domestic" and "Barannikov") in connection with the above-referenced matter.

Prior to my engagement, Plaintiff Denis Fakhurtdinov filed a motion seeking enforcement of an alleged settlement agreement and to impose sanctions. Defendant and Cross-Claimant ITG Communications has also put in a motion in support of enforcement. Opposition papers to the motion are currently due on December 30, 2024.

I have conferred with opposing counsel regarding my request for additional time to respond, and they have consented to an extension of 1-2 weeks. Additionally, the holiday season has impacted my firm's ability to review the case and prepare the filings promptly, as we would under normal circumstances. An adjournment would ensure that I can fully understand the substantive and procedural history of this matter and provide the competent representation that the Defendants deserve.

Accordingly, the undersigned respectfully requests that the deadline for submitting the opposition papers on behalf of Defendants Domestic and Barannikov be extended to January 9, 2025. Please note that the undersigned also filed a Notice of Appearance and a Notice of Consent to Change Attorney on December 24, 2024, which may still require the Court's approval.

Thank you for your consideration of this request.

Respectfully submitted,

/s/Denis Vorontsov, Esq.
Attorney for Defendants Domestic and Barannikov

CC: Mathew R Capobianco - Attorney for ITG Communication; Jason Mizrahi - Attorney for Plaintiff Denis Fakhurtdinov